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July 14, 1993

US EPA RECORDS CENTER REGION 5



471862

Ms. Mary Beth Novy (HSRW-6J)  
U.S. EPA - Region 5  
77 W. Jackson St.  
Chicago, IL. 60604

Dear Mary Beth:

Subject: Comments on the Phase I Summary Report for the Albion-Sheridan  
Landfill Superfund Site, Calhoun County, Michigan.

The following are my comments on the above document. They are organized by  
general and page/paragraph specific. Comments generated by our geologist,  
Mr. Bob Delaney, will be sent under a separate cover within a day or two.

General Comments:

Historical documentation indicates that many drums of liquid and solid waste of various chemical composition could be buried at this site. Certainly this is only supported by the fact that approximately 40 drums were found on the surface of the site and were addressed by a Removal Action conducted by the U.S. Environmental Protection Agency (EPA) in 1986. From the start of this project with the development of the work plan in the spring of 1992, the Michigan Department of Natural Resources (MDNR) has voiced it's strong concern to the EPA that use of a municipal landfill presumptive remedy for this heavily industrial landfill adequately address any "hot spots" of industrial waste. It has been our position that the site was not well suited for a municipal landfill presumptive remedy, but that as a "pilot project" it might be useful to determine the applicability of the presumptive remedy to such sites. In order to adequately address any industrial "hot spots" at the site, a thorough geophysical survey, including EM-31, EM-34 and Magnetometer, needed to be conducted over the entire the site. The MDNR strongly recommended that a grid spacing pattern be utilized that would adequately define the characteristics of the landfill and indicate the possible presence of source areas or "hot spots". The MDNR also strongly recommended that if and when hot spots were identified, test pitting, as prescribed in the work plan, should be conducted to identify and characterize any possible "hot spot" source areas.

In various discussions the EPA and the MDNR have had during the evolution of this project, the EPA has stated that "we don't want another Metamora". The MDNR has never suggested to the EPA that the extent of removal that occurred at Metamora would be necessitated by the characterization of drums buried at the site. What we have asked for and continue to ask for is a commitment from the EPA to conduct a thorough Magnetometer survey on the site and conduct test pits and characterize the waste in any potential "hot spots" if the Magnetometer survey or other information indicates that buried drums or other "hot spots" may exist. The manner in which the geophysical surveys were conducted was not suitable for identifying potential hot spots, and was therefore inconclusive. Coincidentally, buried drums were identified at the site through observation of a rabbit burrow on the site. Approximately five drums were observed at this location in this manner.

According to the EPA guidance for municipal landfill presumptive remedies, certain assumptions are made in order to facilitate and expedite the cleanup process. However, the guidance clearly provides a means for identifying and addressing "hot spots". We strongly urge EPA to perform test pitting of the already identified location where drums are buried, consistent with the approved workplan and James Mayka's April 21, 1992 letter in which he stated that "If we discover any obvious hot spots during the investigation we will not ignore them". In addition we strongly urge EPA to conduct an appropriate investigation for "hot spots" throughout the remainder of the landfill, which would include an amended Magnetometer survey with a grid pattern containing closely spaced transects and test pitting if potential "hot spots" are indicated.

If the appropriate investigation is not performed for this site it is highly unlikely that the MDNR will be able to concur in the remedy eventually selected for this site. In accordance with the Superfund Memorandum of Agreement, we may also pursue this matter up the chain of command via the dispute resolution process.

#### Specific Comments:

##### Page #, Sec.#, Paragraph, Line

2-16 - 2.4.2.4 - Para 1 - line 3 - The well locations are illustrated on figure 8 versus figure 9.

2-20 - 2.4.3.1.2 - Para 2 - We are only aware of two rounds of monitor well samples being taken. Was there a third round taken and if so when?

2-33 - 2.6 - Please state somewhere in section 2.6 where the residential well results can be found, i.e., appendix L.

2-34 - 2.7 - Please state somewhere in section 2.7 where surface soil analytical results can be found, i.e., appendix I.

3-7 - 3.1.4.1 - Two of the three copies of the Phase I Summary Report we received had figures 17-24 in black and white. If you use color coding in the report, the figures need to match, otherwise use black and white patterns in both places.

3-10 - 3.3 - Test pitting is listed as an approved contingency in the work plan if hot spots are identified. We strongly urge EPA to perform test pitting of the already identified location where drums are buried, consistent with the approved workplan and Mr. James Mayka's April 21, 1992, letter in which he stated that "If we discover any obvious hot spots during the investigation we will not ignore them". In addition we strongly urge the EPA to conduct an appropriate investigation for "hot spots" throughout the remainder of the landfill, which would include an amended Magnetometer survey with a grid pattern containing closely spaced transects and test pitting if potential "hot spots" are indicated.

5-1 - 5.1 - Although figures 47 through 59 show contamination constituent concentration contours in the three major aquifer zones, we suggest adding an additional figure(s) to show the overall configuration of the combined leachate plume within the three aquifer zones. This will enable the general public to better understand the overall shape of the plume.

5-3 - 5.2.2 - We will reserve judgement on the status of possible groundwater contamination emanating from the site until we have had a chance to review and evaluate round 2 of the groundwater sample results.

If you have any questions, feel free to contact me.

Sincerely,

*Claudia Kerbawg* for  
Gene L. Hall  
Superfund Section  
Environmental Response Division  
517-373-6808

cc: Ms Claudia Kerbawg, MDNR  
Mr. Bob Delaney, MDNR  
Albion-Sheridan File (U1)